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19 Attorneys for Plaintiff  
20 Art of Living Foundation

21 UNITED STATES DISTRICT COURT  
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23 NORTHERN DISTRICT OF CALIFORNIA  
24  
25 SAN JOSE

26 ART OF LIVING FOUNDATION, a ) Case No.: CV 10-5022-LHK  
27 California corporation, )  
28 Plaintiff, ) **SECOND STIPULATION AND**  
1 v. ) **[PROPOSED] ORDER RE: FILING**  
2 DOES 1-10, inclusive, ) **CERTAIN DOCUMENTS UNDER**  
3 Defendants. ) **SEAL**

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1 Pursuant to Local Rule 7-12 and 79-5 and General Order 62, the parties stipulate and  
2 respectfully request this Court to permit the filing of certain exhibits under seal.

3 Plaintiffs have sued Doe Defendants alleging, among other things, Copyright Infringement and  
4 Trade Secret Misappropriation, arising from alleged posting on the internet of certain documents  
5 and/or links to certain documents, namely the Training Guide Phase One, the Continuation Manual,  
6 and the Yes! Teacher Notes (collectively, the “Manuals”), the Breath Water Sound Manual  
7 (“BWSM”), and a written description of Plaintiff’s processes for teaching Sudarshan Kriya,  
8 Complaint, ¶¶ 39, 49, 68-70.

9 Defendants Doe/Klim and Doe/Skywalker have specially appeared and filed a Motion to  
10 Dismiss, a Special Motion to Strike, and a Motion to Quash. In support of these motions, Defendant  
11 Doe/Skywalker has filed a declaration, as to which he attached certain documents, some of which he  
12 proposed to file under seal. The documents he proposed to file under seal were: what he understands  
13 to be the “Sudarshan Kriya Notes” , **Exhibit B**, what he understands to be “Training Guide Phase 1,”  
14 **Exhibit C**, what he understands to be “Yes+ Teacher Notes,” **Exhibit D** and what he understands to be  
15 the BWSM, **Exhibit E**. Declaration of Doe/Skywalker, ¶ 9 (hereinafter “Proposed Sealed Exhibits”).  
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17 Doe/Skywalker has proposed to file these documents under seal solely so as not to  
18 prejudice any rights that Plaintiff may have to assert Trade Secret rights or Copyrights as to such  
19 documents in this litigation.

20 Plaintiffs stipulate to and respectfully request the Court to order that Defendants be  
21 permitted to file the Proposed Sealed Exhibits under seal.

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1 Nothing in this Stipulation should be construed as a waiver, admission or concession by  
2 either party regarding the factual, legal or evidentiary status of any of the Proposed Sealed Exhibits,  
3 or of any right any party or third party may have to seek to have such Exhibits unsealed at some future  
4 date.

5 Respectfully submitted,

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7 KRONENBERGER BURGOYNE LLP

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9 \_\_\_\_\_/s/  
10 Jeffrey Rosenfeld  
11 Attorney for Plaintiff Art of Living Foundation

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13 \_\_\_\_\_/s/  
14 Joshua Koltun  
15 Attorney for Doe/Klim and Doe/Skywalker

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PURSUANT TO STIPULATION, IT IS SO ORDERED

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Dated: May 17, 2011

18   
19 Hon. Lucy H. Koh  
20 United States District Judge

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